

1 MELANIE D. MORGAN, ESQ.  
2 Nevada Bar No. 8215  
3 SCOTT R. LACHMAN, ESQ.  
4 Nevada Bar No. 12016  
5 AKERMAN LLP  
6 1635 Village Center Circle, Suite 200  
7 Las Vegas, Nevada 89134  
8 Telephone: (702) 634-5000  
9 Facsimile: (702) 380-8572  
10 Email: scott.lachman@akerman.com

11 *Attorneys for Bank of America, N.A.*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 BANK OF AMERICA, N.A.,

15 Plaintiff,  
16 v.

17 WEST SAHARA COMMUNITY  
18 ASSOCIATION; ALEX BEREZOVSKY,  
19 INDIVIDUAL AND AS TRUSTEE OF THE  
20 ABER TRUST; NOESIS ESTATE  
21 MANAGEMENT LLC; and ATC  
22 ASSESSMENT COLLECTION GROUP, LLC,

23 Defendants.  
24 NOESIS ESTATE MANAGEMENT, LLC, a  
25 Nevada limited liability company,

26 Counterclaimant,  
27 v.

28 BANK OF AMERICA, N.A.; JASON L. SNOW,  
an individual; and any and all other person  
unknown claiming any right, title, estate, lien, or  
interest in the Property adverse to the Plaintiff's  
ownership, or any cloud upon Plaintiff's title  
thereto; DOES 1 through 10, inclusive,

29 Counter-defendants,

30 Case No.: 2:16-cv-00500-RFB-BNW

31 **JOINT STIPULATION TO  
32 COORDINATE SUMMARY JUDGMENT  
33 DEADLINES**

34 **[FIRST REQUEST]**

AKERMAN LLP  
1635 VILLAGE CENTER CIRCLE, SUITE 200  
LAS VEGAS, NEVADA 89134  
TEL.: (702) 634-5000 - FAX: (702) 380-8572

35 Pursuant to Federal Rule of Civil Procedure 6(b) and District of Nevada Local Rule IA 6-1,  
36 Bank of America, N.A. (**BANA**), West Sahara Community Association (**HOA**), and Noesis Estate  
37 Management LLC (**Noesis**) jointly agree and request the court coordinate all outstanding summary  
38 judgment deadlines with respect to BANA's summary judgment motion and Noesis's countermotion  
39 for summary judgment. (ECF Nos. 65, 70.)

1 BANA filed a summary judgment motion on May 14, 2020. (ECF No. 65.) The HOA  
2 responded to BANA's summary judgment motion on June 5, 2020. (ECF No. 68.) The court set  
3 BANA's reply deadline as June 19, 2020. (ECF No. 68, minutes) The court extended Noesis's  
4 deadline to respond to BANA's summary judgment to June 8, 2020. (ECF No. 67.) Noesis  
5 responded to BANA's summary judgment motion on June 8, 2020. (ECF No. 69.) The court set  
6 BANA's reply deadline as June 22, 2020. (ECF No. 69, minutes) Noesis also countermoved for  
7 summary judgment on June 8, 2020 (ECF No. 70.) The court set BANA's opposition deadline as  
8 June 29, 2020. (ECF No. 69, minutes)

9 BANA's reply and opposition deadlines are spread out over various dates in June 2020: June  
10 19, June 22, and June 29. (ECF Nos. 68-70, minutes.) In an effort to coordinate briefing, BANA  
11 desires to file a reply supporting summary judgment and an opposition to Noesis's countermotion  
12 on June 29, 2020. This is the parties' first request to extend these deadlines and is warranted to  
13 coordinate briefing schedules and avoid three separate briefs.

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1       This extension is not requested for purposes of undue delay and will not prejudice any party.

2       Dated this 9th day of June, 2020.

3       **AKERMAN LLP**

4       /s/ Scott R. Lachman

5       MELANIE D. MORGAN, ESQ.  
Nevada Bar No. 8215  
6       SCOTT R. LACHMAN, ESQ.  
Nevada Bar No. 12016  
7       1635 Village Center Circle, Suite 200  
Las Vegas, NV 89134

8       *Attorneys for Bank of America, N.A*

9       **GREENE INFUSO, LLP**

10       /s/ Sean B. Kirby

11       KEITH BARLOW, ESQ.  
Nevada Bar No. 12689  
12       MICHAEL V. INFUSO, ESQ.  
Nevada Bar No. 7388  
13       SEAN B. KIRBY, ESQ.  
Nevada Bar No. 14224  
14       3030 S. Jones Blvd., Suite 101  
Las Vegas, Nevada 89146

15       *Attorneys for Noesis Estate Management LLC*

16       **TYSON & MENDES LLP**

17       /s/ Christopher A. Lund

18       THOMAS E. MCGRATH, ESQ.  
Nevada Bar No. 7086  
19       CHRISTOPHER A. LUND, ESQ.  
Nevada Bar No. 12435  
20       3960 Howard Hughes Parkway, Suite 600  
Las Vegas, Nevada 89169

21       *Attorneys for West Sahara Community Association*

AKERMAN LLP

1635 VILLAGE CENTER CIRCLE, SUITE 200  
LAS VEGAS, NEVADA 89134  
TEL.: (702) 634-5000 - FAX: (702) 380-8572

22       **COURT APPROVAL**

23       IT IS SO ORDERED.



24       RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

25       DATED this 10th day of June, 2020.